

MICHAEL A. CADDELL (SBN 249469)
 CYNTHIA B. CHAPMAN (SBN 164471)
 AMY E. TABOR (SBN 297660)
 CADDELL & CHAPMAN
 628 East 9th Street
 Houston, TX 77007-1722
 Tel: (713) 751-0400
 Fax: (713) 751-0906

FOSTER C. JOHNSON (SBN 289055)
 JOSEPH AHMAD
 NATHAN CAMPBELL
 AHMAD, ZAVITSANOS & MENSING, PLLC
 1221 McKinney Street, Suite 2500
 Houston, TX 77010
 Tel: (713) 655-1101
 Fax: (713) 655-0062

Attorneys for Plaintiff
 JANE DOE

TONY LOPRESTI, County Counsel (S.B. #289269)
 XAVIER M. BRANDWAJN, Deputy County Counsel (S.B. #246218)
 JOSÉ L. MARTIN, Deputy County Counsel (S.B. #203709)
 OFFICE OF THE COUNTY COUNSEL
 70 West Hedding Street, East Wing, Ninth Floor
 San José, California 95110-1770
 Telephone: (408) 299-5900
 Facsimile: (408) 292-7240

Attorneys for Defendant
 COUNTY OF SANTA CLARA

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

JANE DOE, individually and on behalf of others
 similarly situated,

Plaintiff,

v.

THE COUNTY OF SANTA CLARA d/b/a
 SANTA CLARA VALLEY MEDICAL
 CENTER,

Defendant.

No. 23-CV-04411 WHO

**JOINT STIPULATION FOR EXTENSION
 OF TIME FOR FILING RESPONSE AND
 REPLY BRIEFS REGARDING
 DEFENDANT COUNTY OF SANTA
 CLARA'S MOTION TO DISMISS**

Date: May 1, 2024
 Time: 2:00 pm
 Crtrm: 2, 17th Floor
 Judge: Hon. William H. Orrick

Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiff Jane Doe (“Plaintiff”) and Defendant County of Santa Clara (“Defendant”), by and through their respective counsel of record, hereby stipulate as follows.

WHEREAS Defendant filed a Motion to Dismiss, (ECF No. 47), and Request for Judicial Notice, (ECF No. 48), on March 14, 2024;

WHEREAS Plaintiff’s Response to Defendant’s Motion to Dismiss and Request for Judicial Notice are currently due on March 28, 2024;

WHEREAS Defendant’s Reply in Support of its Motion to Dismiss and Request for Judicial Notice is currently due seven days after the Response;

WHEREAS because of counsel’s vacation and other scheduling conflicts, counsel have agreed to a one-week extension of both the Response and Reply deadlines;

WHEREAS the proposed extensions will not alter the hearing scheduled on the Motion to Dismiss and Request for Judicial Notice for May 1, 2024;

NOW, THEREFORE, the parties agree and jointly request that the Court order as follows:

1. Plaintiff shall Respond to Defendant’s Motion to Dismiss and Request for Judicial Notice no later than April 4, 2024;
2. Defendant shall file any Reply in Support of its Motion to Dismiss and Request for Judicial Notice no later than April 18, 2024; and
3. The Hearing on Defendant’s Motion to Dismiss and Request for Judicial Notice shall remain scheduled for May 1, 2024.

Dated: March 25, 2024

Respectfully submitted,

By: /s/ Michael A. Caddell

MICHAEL A. CADDELL
CYNTHIA B. CHAPMAN
AMY E. TABOR
CADDELL & CHAPMAN

Attorneys for Plaintiff JANE DOE

1 Dated: March 25, 2024

By: /s/ Xavier M. Brandwajn

2 TONY LOPRESTI
3 COUNTY COUNSEL
4 XAVIER M. BRANDWAJN
5 JOSÉ L. MARTIN
6 Deputy County Counsel

Attorneys for Defendant
COUNTY OF SANTA CLARA

7 **CERTIFICATION**

8 Pursuant to Civil Local Rule 5-1(i)(3), I attest that the concurrence of Xavier Brandwajn in
9 the filing of this stipulation has been obtained.

10 /s/sAmy E. Tabor

Amy E. Tabor

11 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED** that:


12 1. Plaintiff shall Respond to Defendant's Motion to Dismiss and Request for Judicial
13 Notice no later than April 4, 2024.

14 2. Defendant shall file any Reply in Support of its Motion to Dismiss and Request for
15 Judicial Notice no later than April 18, 2024.

16 3. The Hearing currently scheduled for May 8, 2024, remains scheduled at 2:00 p.m.

17 **THE PARTIES ARE REMINDED THAT THE BRIEFING SCHEDULE REQUIRED**
18 **BY THE LOCAL RULES IS SET SO THAT REPLIES ARE FILED AT LEAST 14 DAYS,
19 **NOT 13 DAYS, IN ADVANCE OF THE HEARING. See Civ. L. R. 7-2(a) & 7-3.****

20
21
22 Dated: March 26, 2024

23 
24 THE HONORABLE WILLIAM H. ORRICK
25 U.S. District Court Judge
26
27
28